

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

DAVID HOROWITZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SUNLANDS TECHNOLOGY GROUP,  
TONGBO LIU, YIPENG LI, JIANHONG  
YIN A/K/A PENG OU, LU LU, MICHAEL  
MINHONG YU, YANG WANG,  
GAONENG JI, SAM HANHUI SUN,  
XIAOCHUAN WANG, GOLDMAN SACHS  
(ASIA) L.L.C., CREDIT SUISSE  
SECURITIES (USA) LLC, AND J.P.  
MORGAN SECURITIES LLC,

Defendants.

No. 1:19-CV-03744-RML

CLASS ACTION

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that, pursuant to the Order Granting Motion for Preliminary Approval of Class Action Settlement, on September 27, 2023 at 2:00 p.m., before the Honorable Robert M. Levy, United States Magistrate Judge of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY, Courtroom 11-B (South), Lead Plaintiff David Horowitz, will and hereby does move the Court for entry of an Order: (1) granting final approval of the Settlement in the Action on the terms set forth in the Stipulation; and (2) approving the proposed Plan of Allocation for distribution of the Net Settlement Fund.<sup>1</sup>

This motion is based on this Notice of Motion; the Memorandum of Law in Support thereof; the Declaration of Brian B. Alexander in Support of the Motions for: (I) Final Approval of Class Action Settlement and Plan of Allocation; and (II) an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiff; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

A proposed Order and Final Judgment granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

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<sup>1</sup> Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation of Settlement dated May 8, 2023 (Dkt. No. 61).

Dated: August 30, 2023

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

By: /s/Brian B. Alexander

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*Lead Counsel for Lead Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Brian B. Alexander  
Brian B. Alexander